EXHIBIT F



Compressed Transcript of the Testimony of MATTHEW PIERSON, 5/3/19

Case: Seal v. Seal, et al.

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3400, Philadelphia, Pennsylvania, on Friday, May 3, 2019, beginning at approximately 9:10 a.m.,	18 Defendant's Documents produced in 105
before Robin Frattali, Registered Professional	Exhibit 84 discovery, Bates stamped P000025,
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1	A. That's not the case, Nick, but it's	1 this entire situation.
2	what I believed.	2 BY MR. PODUSLENKO:
3	Q. By the way, would you agree with me	3 Q. I'm not laughing. It's tragic that
4	that if we go down and drive to Alexandria,	4 you would seem to think that.
5	Virginia and show them all these documents	5 A. Okay, well, I'm glad I'm glad you
6	would you like to do that, and show them and see	6 think that this is tragic but this is the scenario
7	whether they want to pursue or prosecute	that we're in. You're not having to live this, so
8	A. Absolutely. Sure, let's do it.	8 don't act like you are.
9	MR. SOBEL: Is that an	9 Q. FYI, Simone was kidnapped from her
10	appropriate question?	father when she was a child and her dad was dead
11	MR. PODUSLENKO: Yeah, it is.	within three weeks of a kidnapping case being
12	MR. SOBEL: Why?	12 filed.
13	MR. PODUSLENKO: Well, because	13 So you were suggesting here
14	of all these notes and how they're going to	not suggesting, you were telling Louis that, in
15	be prosecuted.	15 fact, Rima had Bruce killed.
16	THE WITNESS: I absolutely	16 A. Yeah. I believed she did.
17	would love to, yeah.	17 Q. Okay. But what facts or evidence did
18	BY MR. PODUSLENKO:	18 you have to support that, that it was true?
19	Q. Good.	19 A. Just believed it.
20	And have you provided why	20 Q. So it's okay in your mind to be able
21	don't you provide the documents in the depositions	21 to tell people that hey, Rima killed Bruce.
22	to them and see	22 A. Yeah.
23	A. Sure.	23 Q. That's okay for you to tell other
24	Q whether they want to prosecute it.	24 people that.
24	Q whether they want to prosecute it.	24 people triat.
gggggggggggggggggggggggggggggggggggggg	Page 218	Page 220
1	A. For sure.	1 A. I believe she did it.
2	MR. SOBEL: Now you're arguing.	2 Q. That's okay.
3	BY MR. PODUSLENKO:	3 A. Yeah.
4	 Q. They will most likely kidnap her and 	4 Q. And you think that's okay to tell
5	take her to their house in Spain where no one	5 other people that .
6	none of us will get to see her again so you need	6 A. Yeah. Sure. I'm not going around
7	to think this through.	7 telling everybody. I told the father of – that
8	All right. So again, what	8 his daughter was in danger with a woman that could
9	basis did you have to suggest that, in fact, she	9 be potentially dangerous. So yes, I'm warning
10	was going to be kidnapped?	10 him .
11	 A. They have her passport. They have her 	11 Q. Do you think that's not damaging to
12	birth certificate. If they believe they're going	12 the person you're saying it about?
13	to get screwed the chance of them being a flight	13 MR. SOBEL: Objection.
14	risk are high. What person wouldn't do that if	14 BY MR. PODUSLENKO:
15	they know that they're going to get in trouble?	15 Q. Go ahead. Do you think that's do
16	MR. SOBEL: Seems like a	16 you think that's damaging to the person who you
17	reasonable answer.	17 said it about?
18	THE WITNESS: I mean, what do	18 A. Ask her. That's not my thing to
19	you what do you want me to say? That's	19 answer for you. I don't know.
20	our fear. Our fear is that they're going to	20 Q. I'm asking you. You're here under
21	take Mariah and go to Spain because they're	21 oath .
22	going to get prosecuted.	22 A. I'm not the one who did these things,
23	You can laugh all you want but	so I couldn't answer that question for you.
24	that's the general that's the nature of	24 Q. Well, this is what you said on

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1		5	
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1	A. Yeah.	1	MR. PODUSLENKO: I am trying to
2	Q. This is what you said in a text. You	2	get through it.
3	don't think do you think that damages the	3	MR. SOBEL: Then stop
4	person you said it about?	4	editorializing. Please.
5	A. Don't know.	5	BY MR. PODUSLENKO:
6	Q. You don't know?	6	Q. Did you ever have conversations or
7	A. Don't know.	7	leave voicemails for Louis relating to the issues
8	Q. Okay. Do you think that you need to	8	of kidnapping?
9	have truth you actually have to have facts to	9	A. Honestly I have no idea.
10	support when you make a statement like that to	10	Q. Did you ever tell Louis that Ron and
11	whoever?	11	Rima were backed into a corner?
12	A. I guess we'll see.	12	A. Possibly.
13	Q. Well, I'm asking you what facts do you	13	Q. Pardon me?
14	have that, in fact, Bruce was murdered by Rima?	14	A. Possibly. I don't remember. I don't
15	MR. SOBEL: Objection. Asked	15	remember what conversations I had with Louis
16	and answered.	16	beside that one.
17	THE WITNESS: Yeah.	17	Q. And when was that conversation? This
18	BY MR. PODUSLENKO:	18	text was in 2018?
19	Q. Pardon me? Sir?	19	A. Yeah, but I don't – I don't – I
20	 A. It's been asked and answered. 	20	don't know honestly know. I can't
21	Q. Well, what was the what's your	21	MR. SOBEL: Can you identify
22	answer?	22	what you're referring?
23	A. I'm not answering again. You have it	23	MR. PODUSLENKO: I'm sorry.
24	in it's in the deposition. She has it	24	D-93.
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1		The Control of the Co	Page 224
1	recorded.	1	THE WITNESS: What does it say?
2	Q. Give me a single actual fact. Sir,	2	BY MR. PODUSLENKO:
3	give me a single actual fact.	3	Q. It doesn't say.
4 5	A. No, I'm not going to.	4 5	A. I don't know that it was 2018. I
6	Q. Because you know it's not true, right?	. S	gon't I don't remember when it was It was a
0	/ No I don't know it's not ton.	9	don't I don't remember when it was. It was a
7	A. No, I don't know it's not true. You	6	long time ago.
7 8	can you believe whatever you want. I'm going	6 7	long time ago. Q. Okay. It was was it after the
8	can you believe whatever you want. I'm going to sit here and believe whatever I want.	6 7 8	long time ago. Q. Okay. It was was it after the lawsuit was filed?
8 9	can you believe whatever you want. I'm going to sit here and believe whatever I want. Q. Well, sir, at trial you're going to	6 7 8 9	long time ago. Q. Okay. It was was it after the lawsuit was filed? A. I believe this was in 2017, that text.
8 9 10	can you believe whatever you want. I'm going to sit here and believe whatever I want. Q. Well, sir, at trial you're going to have to support it.	6 7 8 9 10	long time ago. Q. Okay. It was was it after the lawsuit was filed? A. I believe this was in 2017, that text. Q. That text?
8 9 10 11	can you believe whatever you want. I'm going to sit here and believe whatever I want. Q. Well, sir, at trial you're going to have to support it. A. Okay.	6 7 8 9 10 11	long time ago. Q. Okay. It was was it after the lawsuit was filed? A. I believe this was in 2017, that text. Q. That text? A. That text was in 2017.
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